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October 22, 2009

U.S. Department of Transportation  
Pipeline and Hazardous  
Material Safety Administration  
901 Locust Street,  
Suite 462  
Kansas City, MO 64106-2641  
Attn: Mr. Ivan Huntoon  
Director, Central Region

Return Receipt Requested  
Certified Mail Number  
7008 1830 0002 4858 7531

Reference: CPF 3-2009-5011M

Dear Mr. Huntoon:

In response to the above referenced Notice of Amendment, TEPPCO is providing the following:

1. **§195.402 Procedural manual for operations, maintenance, and emergencies.**
  - a. **General.** Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations.
  - c. **Maintenance and normal operations.** The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.
    - i. **Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and Subpart M of this part.**

**Review of TEPPCO's operation and maintenance manuals revealed that the procedures for inspection and testing of overpressure safety devices 195.428(a) were inadequate.**

**TEPPCO's operation and maintenance manual Section 5.1.1 Procedure did not address inspecting the complete pressure information circuit loop.**

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TEPPCO Partners, L.P.  
Texas Eastern Products Pipeline Company, LLC, General Partner

**During PHMSA's 2008 records inspection, it was found that TEPPCO's personnel were not inspecting the complete pressure information circuit loop. The procedure needs additional language in the overpressure safety devices section to provide guidance on inspection of the complete pressure information circuit loop. For example, if to activate the overpressure protection shutdown requires communication between the pressure transmitter, the PLC, and the pump, then the communication loop between all three devices must be inspected.**

Please find enclosed the proposed revision to the procedure that TEPPCO will be adopting once it has been sent to field operations for review. This modified procedure is intended to take care of the inspection of the complete pressure information circuit loop, as identified in the warning letter.

If you have any questions with the attached procedure, please contact the writer immediately.

Sincerely,

A handwritten signature in blue ink that reads "Jlynn P. Stout". The signature is written in a cursive, flowing style.

Jlynn P. Stout  
Pipeline Compliance Specialist  
Encls.

# PROCEDURES MANUAL FOR PIPELINE OPERATIONS, MAINTENANCE, AND EMERGENCIES

## *Operations and Maintenance Procedures*

**Subject:** Over Pressure Safety Devices

**Section:** 1305

**References:** 49 CFR §§ 195.428

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**Date:** 09/01/2009

**Scope:**

These procedures provide instruction for the operation and maintenance of over-pressure protection devices for the Company's pipeline facilities and breakout tanks.

**Procedure:**

Each pressure limiting device, relief valve, pressure regulator, and other types of pressure control equipment (pressure transmitters, switches, PCVs) shall be inspected and tested at intervals not exceeding 15 months, but at least once each calendar year for crude oil and other non-HVL products and not exceeding seven and a half months, but at least twice each calendar year for HVL products, and each inspection and repair is documented on the appropriate form to determine that it is:

1. Functioning properly
2. In good mechanical/electrical condition
3. Adequate from the standpoint of capacity and reliability of operation for the service in which it is used.
4. Set to function at the correct pressure
5. Properly installed and protected from foreign materials or other conditions that might prevent proper operation.

Control and shutdown setpoints on pumping units shall be checked at intervals not exceeding 15 months, but at least once each calendar year for crude oil and other non-HVL products and not exceeding 7 1/2 months, but at least twice each calendar year for HVL products, to ensure the units are operating within design limits. If the check indicates a malfunction of the control devices, the unit will be shut down and remain so until control devices have been repaired or replaced, checked, calibrated and tested.

In addition, test will be conducted on all relief valves on pressure breakout tanks not exceeding intervals of 5 years. The valve has to removed, totally torn down, inspected and tested. Would only be considered on our spheres.

Testing of relief valves means that pressure (nitrogen only) will be applied to the relief valve inlet to ascertain that the relief valve "pops" at the set pressure.

Any equipment found to be defective during the inspection, shall be repaired or replaced, as early as practicable. If a device is removed, to be repaired or tested, a pre-tested device shall be installed in its place to provide adequate protection.

Where feasible, these pressure-limiting devices shall be tested in place to determine that they function at the desired pressure setting. Any device used for overpressure protection of the pipelines will ensure the maximum relief set

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### Procedure Contd.

point will not allow the pipeline to exceed its MOP or exceed 110% of MOP even in surge or a failure mode.

#### Surge Analysis

There are two types of projects that may require surge analysis: pipeline modifications and hydrostatic tests.

Typical pipeline modifications that could require surge analysis include, but are not limited to, the following:

- Adding new pump stations on an existing line section or adding new pumps at existing stations.
- Modifying existing pumps, e.g., more stages or larger stages
- Modifying station piping which might isolate protection devices, including relief systems
- Adding remote-controlled mainline gate valves on existing line sections
- Changing high pressure shutdown or low flow switch point settings
- Changing the operating philosophy or operating procedure of a line section, e.g., introducing a new "tightline" or "surge" operation without first analyzing it. Tightlining is receiving product from a facility or pipeline without providing any surge or storage capacity.
- Pumping new fluids with a higher specific gravity or bulk modulus than the fluids currently being pumped
- Adding equipment or pipe that has a design pressure lower than the mainline design pressure
- Changing the set point of mainline pressure relief valves, making the pressure relief system inoperative or isolating the relief system from protecting the pipeline by changing the valve alignment.

The Project Manager performs a surge analysis for all pipeline modifications and hydrostatic tests that may result in increased or decreased operating pressures. If the analysis indicates either an increased or decreased Maximum Operating Pressure (MOP) for the pipeline segment, the analysis results shall be forwarded to the Pipeline Integrity Department for approval of the final discharge pressure change.

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## *Operations and Maintenance Procedures*

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### On-Line Test of Relay ESD Systems

1. Gather cause and effect drawings and list from the CMMS/Instrument Files for the ESD system to be checked.
2. Review all devices to be tested with Operations to see what can be checked. Ensure Operations is aware of all affected equipment for each check.
3. Make note of all those that cannot be checked, reason why, and the Supervisor who made decision.
4. Obtain permit from Operations to check the ESD Systems.
5. Operations will isolate equipment from service.
6. Prior to testing of each device, Operations will be notified.
7. Perform checks in accordance with manufacture recommendations and the device functioned properly with the desired results.
8. Record as found, as left data.
9. Make and record, repair as needed. A separate Work Order may be needed for repairs.
10. Inform Operations when complete, return equipment to service.
11. Verify equipment is back in service
12. Return to step 7 till all devices are complete.
13. Close out permit.

**Responsibilities:** The Engineering Department shall be responsible for assigning over pressure safety device setting and pressure control limits in accordance with applicable codes. Local Field Office Supervision shall be responsible for implementing these instructions, performing the inspection and tests, and preparing the proper reports.

**Records:** Records shall be retained in local field office files for at least 2 years or until the next inspection or test, whichever is longer. (See Section 1001)

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